

I do not agree with RM-11306 in any shape or form. The amateur radiobands have been self policing for many years and with these changes it will be almost impossible to self police the digital modes known as Pactor II and Pactor III.

1. These protocols are proprietary and the company that owns the rights refuses to open them up for the amateur community to experiment with or even use to monitor the protocol on the amateur bands. Without the ability to monitor these transmissions I do not see how we can self police the amateur radio bands.
2. Since Pactor II and III are not published I fail to see why the FCC continually allows this operation on the amateur radio bands.
3. §97.113 Prohibited transmissions states the following: (5)  
Communications, on a regular basis, which could reasonably be furnished alternatively through other radio services. This would mean that Winlink is in direct violation of this rule as what it does is the same as several other commercially available radio services. Stations running automatic PMBO's should be restricted from doing so because of this rule. They are bypassing other radio services that offer the same services.

What this RM will do is to allow many digital stations on the amateur bands that will be duplicating commercial services which are against the wording of Part 97 of the Amateur Radio Rules.

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